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Honorable Paul G. Gardephe
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: 1:23-cv-06883-PGG TRUMP v. SIMON & SCHUSTER INC et al.

Dear Judge Gardephe,

We represent the Plaintiff, Mr. Trump, in the above-referenced case, and write to update the Court on the status of Mr. Trump's application for copyright registration as it pertains to *The Trump Tapes*, the sound recording and text work that is the subject of this litigation. This is to confirm that the United States Copyright Office has registered Mr. Trump and Defendant Mr. Woodward as co-authors, i.e. co-claimants, of the work. The copyright has been assigned Registration Number SR0000975712 and bears an effective date of registration of February 28, 2023.

We ask that the Court take judicial notice of the issuance of a copyright registration in the name of Mr. Trump, and/or permit the Plaintiff to amend its complaint, at least by interlineation, to reflect the issuance and effective date of the copyright registration in favor of Mr. Trump.

Respectfully submitted,

/s/ Robert Garson

Robert Garson

cc: Counsel for the Defendants